

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: Search Warrant Executed on
November 5, 2021

Case No.: 21 Misc. 813 (AT)

In re Search Warrant Executed on
November 3, 2021

Case No.: 21 Misc. 819 (AT)

In re Search Warrant Executed on
November 3, 2021

Case No.: 21 Misc. 825 (AT)

SPECIAL MASTER ORDER

By Order dated December 8, 2021 (the “Order”), the Court appointed me as Special Master in each of the above-captioned matters to determine what materials seized by the Government are responsive to the search warrants, as well as to rule on any privilege objections raised by the parties following review of responsive materials by the Government’s filter team.

The first round of documents found by me to be responsive has now been provided by the Government’s filter team to the Petitioners, and each has objected to disclosure of those materials based upon responsiveness grounds and/or based upon First Amendment journalistic privilege issues. Counsel for Mr. O’Keefe and Project Veritas now asks for leave to brief certain issues to me. That application is resolved as follows:

1. I will resolve Petitioners’ objections related to responsiveness, which have already been submitted. Consistent with my previous order, the investigative team shall not be provided with any briefing by Petitioners as to such objections. However, in order to make some determinations, I may require the investigative team to respond to questions I ask, without reference to the underlying content of any seized item.

2. As to objections raised by the Petitioners related to the First Amendment and journalistic privileges, Petitioners may submit briefing concerning the law and principles supporting their objections by March 25, 2022. The Government's investigative team may submit responsive briefing on those issues by April 1, 2022. The Parties' briefing on those issues shall be not be submitted *ex parte*, but shall not disclose or make any reference to the specific content of any seized material.

Dated: New York, New York
March 21, 2022


HON. BARBARA S. JONES (Ret.)